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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

16
17 LISA A. BRYANT, : Case No.: 2:20-cv-00594-CDS-EJY
18 Plaintiff, :
19 :
20 v. :
21 MADISON MANAGEMENT SERVICES, : **Stipulation for an Extension of Time to**
22 LLC, and WALDMAN & PORRAS, PLLC, : **File Plaintiff's Reply to Defendants'**
23 Defendants. : **Opposition to Plaintiff's Motion for**
24 : **Summary Judgment and to File Joint**
25 : **Pretrial Order**
26 :
27 :
28 : **[FIRST REQUEST]**

26 Plaintiff Lisa Bryant and Defendants Madison Management Services, LLC, and Waldman
27 & Porras, PLLC, (collectively known as the “Parties) hereby submit the following Stipulation for
28 an extension of time for Plaintiff to file her Reply to Defendants’ Response in Opposition to

1 Plaintiff's Motion for Summary Judgment and for the Parties to file the Joint Pretrial
2 Order. Plaintiff's counsel (Dann Law) is preparing for a trial and Plaintiff's other counsel
3 (Freedom Law Firm) was out of the office from April 11, 2022 to April 18, 2022. Defense
4 counsel is dealing with moving his mother and dealing with deadlines in other matters. This
5 extension is requested in good faith and is not for purposes of delay or prejudice to any party.

6

7 **Procedural History**

8 On March 17, 2022, Plaintiff filed her Motion for Summary Judgment. (ECF No. 62).
9 Defendants filed their Response in Opposition to Plaintiff's Motion for Summary Judgment
10 on April 7, 2022. (ECF No. 63). Plaintiff's Reply is due April 21, 2022.

11 THEREFORE, the Parties hereby stipulate and agree to extend the deadline for
12 Plaintiff's to file a Reply to May 5, 2022. Parties also hereby stipulate and agree to extend the
13 deadline to file the Joint Pretrial Order to May 12, 2022.

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1 **IT IS SO STIPULATED.**

2 DATED: April 20, 2022

3 FREEDOM LAW FIRM

4 By: /s/ George Haines

5 GEORGE HAINES, ESQ.
6 Nevada Bar No.: 9411
7 8985 S. Eastern Ave., Suite 350
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9 *Attorney for Plaintiff*
LISA BRYANT

10 DANN LAW FIRM

11 By: /s/ Marc E. Dann

12 Marc E. Dann, Esq.
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16 *Counsel for Plaintiff Lisa A. Bryant*

17 DATED: April 20, 2022

18 WALDMAN & PORRAS, PLLC

19 By: /s/Nicholas M. Porras

20 NICHOLAS M. PORRAS, ESQ.
21 Nevada Bar No.: 12849
22 201 West Liberty Street, Suite 207
23 Reno, NV 89501
24 *Attorney for Defendants*
25 MADISON MANAGEMENT SERVICES,
26 LLC, AND PORRAS, PLLC

27 **IT IS SO ORDERED**

28 
UNITED STATES DISTRICT JUDGE

29 Dated: 05/09/2022